

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

  
JOSEPH R. GOODWIN  
UNITED STATES DISTRICT JUDGE

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**JOINT MOTION TO DISMISS WITH PREJUDICE AND TRANSFER TO MDL 2187**

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Inc., Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move the court to dismiss with prejudice these actions and all claims against the Ethicon Defendants which were, or could have been asserted, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). Each party shall bear her or its own costs. The dismissal of these cases relates only to the Ethicon Defendants. Plaintiffs continue to pursue claims against C.R. Bard, Inc., and respectfully request the Court transfer this case to MDL 2187.

Respectfully submitted,

/s/ Laura J. Baughman  
Laura J. Baughman  
Baron & Budd, P.C.  
3102 Oak Lawn Ave., Ste. 100  
Dallas, TX 75219  
(214) 521-3605  
lbaughman@baronbudd.com  
*Counsel for Plaintiffs*

/s/ William M. Gage  
William M. Gage (MS Bar #8691)  
Butler Snow LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4561  
william.gage@butlersnow.com

/s/ Susan M. Robinson  
Susan M. Robinson (W. Va. Bar #5169)  
Thomas Combs & Spann PLLC

300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 24338  
(304) 414-1800  
srobinson@tcspllc.com

*Counsel for the Ethicon Defendants*

**EXHIBIT A**

2:15-cv-12796	Bennett v. Ethicon
2:14-cv-26042	Reeves v. Ethicon